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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

KARIN E. WOLF, DANIEL CRANE, and GRETCHEN CRANE, CIVIL ACTION

Plaintiff, Case No.: 2:19-cv-16979-BRM-ESK

v.

STATE OF NEW JERSEY, COUNTY OF BERGEN. ADMINISTRATIVE OFFICE THE COURTS, HON. GLENN A. GRANT, J.A.D, DAVID TANG, LAURA SIMOLDONI, ARTHUR ANDREANO, DEPARTMENT OF CHILDREN AND FAMILIES (DCF), **CHILD** DIVISION OF PROTECTION AND PERMANENCY (DCPP), **KARI** FERRARE, LYDIA TATEKAWA, DR. ALLWYN J. LEVINE, VALERIE SOLIMANO, ESQ., JAY LUCIANA ATKINS, ESQ., COUTINHO-CRANE, PETER MELCHIONNE,

Defendants.

## NOTICE OF APPEAL TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Plaintiffs, Karin E. Wolf, Daniel Crane and Gretchen Crane, by and through Kenneth Rosellini, Esq., their attorney, appeal to the United States Court of Appeals for the Third Circuit from the Orders and Opinions of the District Court for the District Court of New Jersey dismissing Defendants ADMINISTRATIVE OFFICE OF THE COURTS, HON. GLENN A. GRANT, J.A.D., DAVID TANG, LAURA SIMOLDONI, ARTHUR ANDREANO, VALERIE SOLIMANO, ESQ. (referred to together at times as the "Judicial Defendants"), and Defendant, LUCIANA COUTINHO-CRANE, on a motions to dismiss (docket entries 87 and 88, filed and entered on March 6, 2023).

The issues in this appeal include, inter alia, that the District Court improperly dismissed the Plaintiffs' claims against the Defendants for injunctive relief to enjoin the Judicial Defendants, and Luciana Coutinho-Crane, their officers, agents and employees, and all other persons in active concert or participation with Defendants, as well as any successors or assigns, from engaging in discriminatory, retaliatory, and coercive policies and practices against individuals based on their disabilities, and specifically from failing or refusing to take appropriate steps to ensure compliance with the requirements of Title II of the ADA, 42 U.S.C. § 12131 et seq., and its implementing regulations, 28 C.F.R. Part 35; Title III of the ADA, 42 U.S.C. § 12181 et seq., and its implementing regulations, 28 C.F.R. Part 36, and Section 504 of the Rehabilitation Act, 29 U.S.C. § 794; modify their policies, practices, and procedures as necessary to bring them into compliance with Title II of the ADA, 42 U.S.C. § 12131 et seq., and its implementing regulations, 28 C.F.R. Part 35; Title III of the ADA, 42 U.S.C. § 12181 et seq., and its implementing regulations, 28 C.F.R. Part 36; to declare that they have violated Title II of the ADA, 42 U.S.C. § 12131 et seq., and its implementing regulation, 28 C.F.R. Part 35; Title III of the ADA, 42 U.S.C. §12181 et seq., and its implementing regulation, 28 C.F.R. Part 36; and Section 504 of the Rehabilitation Act, 29 U.S.C. § 794; an injunction enjoining these Defendants from violating the rights of litigants appearing before the courts of the State of New Jersey, and abusing the process of law so as to deny litigants their fundamental rights under the First Amendment, Fourth Amendment, Eight Amendment, Ninth Amendment, and both the Due Process and Privileges and Immunities clauses of the Fourteenth Amendment for their benefit and to injure persons appearing before the courts of the State of New Jersey.

The parties to the Orders and Opinions appealed from and the names and addresses of their respective attorneys are as follows:

Defendants, **ADMINISTRATIVE OFFICE OF THE** COURTS, HON. GLENN A. GRANT, J.A.D., DAVID TANG, LAURA SIMOLDONI, **ARTHUR** ANDREANO, **VALERIE** SOLIMANO, ESQ. (referred to together at times as the "Judicial **Defendants**")

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Date: April 5, 2023 /s/ Kenneth Rosellini

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